## U.S. BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re ANDREA WITT : CHAPTER 13

:

Debtor(s) : BANKRUPTCY NO. 21-11691

## **OBJECTION TO CERTIFICATION OF DEFAULT**

Debtor(s), Andrea Witt, by their attorney, Paul H. Young, Esquire, hereby objects to the Certification of Default filed by Allied First Bank, SB dba Servbank on November 2, 2023. Debtors believe they can become current on all post-petition payments due under the November 22, 2022 stipulation with the Lender.

Respectfully submitted,

/s/ Paul H. Young PAUL H. YOUNG, Esquire Young, Marr & Associates 3554 Hulmeville Road, Suite 102 Bensalem, PA 19020 P: 215-639-5297 F: 215-639-1344

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Dated: November 3, 2023